

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KELLY AMEDURI,)	
)	
Plaintiff,)	Civil Action No. 1:19-cv-00250
)	
v.)	
)	Honorable Susan Paradise Baxter
ALLEGHENY HEALTH NETWORK)	
d/b/a ALLEGHENY CLINIC,)	
)	
Defendant.)	

**JOINT STATUS REPORT REGARDING
STAY OF DISCOVERY DEADLINES AND COURT HEARINGS**

The Parties, Kelly Ameduri (“Plaintiff”) and Allegheny Health Network d/b/a Allegheny Clinic (“Defendant”), by and through their undersigned counsel, in support thereof, the Parties state as follows:

On April 13, 2020, the Court stayed discovery deadlines and court proceedings at the request of the Parties due to Defendant’s focus on responding to the COVID-19 pandemic. Doc. No. 23. Since then, the Court has ordered the Parties to submit Joint Status Reports every 60 days advising whether the stay should be lifted and, if so, setting forth deadlines to complete outstanding discovery. The Court ordered the Clerk of Court to administratively close the case on July 29, 2020 and ordered that the case would be re-opened on October 2, 2020 and the status of discovery would be re-assessed at that time.

Since that time, the Parties have conferred on this issue. The Parties have discussed settlement but have not resolved the matter. The Parties have also made efforts to prepare to fulsomely engage in discovery once the stay is lifted, which have been limited because the location where Plaintiff worked remains closed. As a result, the Parties request that the case be stayed for

an additional 60 days. The Parties do not anticipate requesting an additional stay. During the final stay period, the Parties will advise potential witnesses to gather records needed to finalize written discovery and prepare for and participate in depositions.

If the Court agrees with this approach, the Parties will submit a final Joint Status Report on November 25, 2020 setting forth deadlines to complete outstanding discovery.

Dated: September 25, 2020

Respectfully submitted,

THE TRIAL LAW FIRM, LLC

JACKSON LEWIS P.C.

/s/ Martell Harris

Martell Harris, Esq.
mh@tlawf.com
PA ID. No. 319504
The Pittsburgher
428 Forbes Avenue
Suite 1700
Pittsburgh, PA 15219
(412) 588-0030

Counsel for Plaintiff

/s/ Laura C. Bunting

Marla N. Presley, Esq.
marla.presley@jacksonlewis.com
PA ID. No. 91020
Laura C. Bunting, Esq.
PA ID. No. 307274
laura.bunting@jacksonlewis.com
1001 Liberty Avenue, Suite 1000
Pittsburgh, PA 15222
(412) 232-0404

Counsel for Defendant

4829-6347-0540, v. 1

It is so ordered.



United States District Judge